

FILED

NOV 26 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY AK DEP CLK

CASE NO. 5:19-cr-475

UNITED STATES OF AMERICA.

v.

MARCUS ANTWAN GAMBRELL
a/k/a "Kannon"

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CRIMINAL INFORMATION

The United States Attorney charges:

COUNT ONE

Beginning on or about December 26, 2018, and continuing to on or about December 28, 2018, in the Eastern District of North Carolina and elsewhere, the defendant, MARCUS ANTWAN GAMBRELL a/k/a "Kannon," aiding and abetting others known and unknown to the Grand Jury, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person having the initials A.B., who had not attained the age of 18 years, and having had a reasonable opportunity to observe A.B., and knowing and in reckless disregard of the fact that A.B. had not attained the age of 18 years, and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2) and 2.

FORFEITURE

The defendant is hereby given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of the offense(s) set forth in Count One, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d):

- (1) Any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense(s), and any property traceable to such property; and
- (2) Any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of such offense(s), or any property traceable to such property.

The forfeitable property includes, but is not limited to, the following:

- An iPad, serial no. F4KK21M5F197

If any of the above-described forfeitable property, as a result of any act or omission of a defendant—

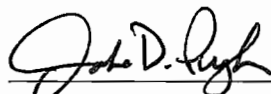
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section

853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

This the 26th day of November, 20 19.

ROBERT J. HIGDON, JR.
United States Attorney

A handwritten signature in cursive script, appearing to read "Jake D. Pugh", is written over a horizontal line.

JAKE D. PUGH
Assistant United States Attorney
Criminal Division